Appl. No. 10/661,167
Amdt. dated November 4, 2008
Reply to Office Action of Sept. 29, 2008

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REMARKS/ARGUMENTS

Before entry of this amendment, claims 1-68 were pending in the application. In this Amendment, claims 1, 7, 32, 44, 59, 62, and 65 have been amended, claims 43 and 49 have been canceled, and no new claims are presented. Thus, after entry of this amendment, which is respectfully requested, claims 1-42, 44-48, and 50-68 will be pending in the application.

I.   TECHNICAL AMENDMENTS TO SPECIFICATION

Paragraphs [0009], [0010], [0011], [0040], and [0075] have been amended to correct minor grammatical errors and obviously incorrect figure numbers. No new matter is added hereby.

II.   TECHNICAL AMENDMENTS TO CLAIMS

Claims 1 and 7 include amendments to correct minor grammatical errors (*i.e.*, "being response" is changed to "being responsive"). These amendments are not intended to limit the scope of or otherwise affect the substance of the claims, but rather to correct minor errors of form. No new matter is added hereby.

III.   CLAIM REJECTIONS UNDER 35 U.S.C. § 101

Claims 1, 59, 62, and 65 (and claims depending thereon) were rejected under 35 U.S.C. § 101 because the claimed invention is allegedly directed to non-statutory subject matter.

In rejecting claim 1 (and dependent claims 2-6) and claim 65 (and dependent claims 66-68), the Office Action stated that the body of the claims must contain hardware support for the recited "system." Claims 1 and 65 have been amended accordingly.

In rejecting claim 59 (and dependent claims 60-61) and claim 62 (and dependent claims 63-64), the Office Action asserts that it was not clear, based on the specification, what type of media was being claimed. Applicants thank the Examiner for his recommendation that "media" should be "storage media" in order to be statutory (Office Action p. 3). Claims 59 and 62 have been amended accordingly.

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The amended claims overcome the rejections under § 101; thus, Applicants respectfully request that the rejections be withdrawn.

IV.   CLAIM REJECTIONS UNDER 35 U.S.C. § 102

All claims (claims 1-68) were rejected under 35 U.S.C. § 102(e) as being anticipated by Lee (US 2002/0129024) (hereinafter "Lee").

Claims 1, 7, 20, and 65. The Office Action asserts that Lee discloses a transform engine configured to concurrently navigate a selected transform process definition and the data to be transformed. Applicants strongly disagree.

Lee neither discloses nor suggests <u>concurrently</u> navigating a transform process definition and data to be transformed or otherwise navigating the definition and data at the same time. Instead, Lee's Identity Server 40 merely teaches transforming a set of data using an XML template (*i.e.* Lee para. [0309]) to an XML file (*i.e.* Lee para. [0312]) without any reference to concurrency.

To back up its assertion, the Office Action states that "[c]oncurrency is achieved because <u>Lee</u> is able to transform one element at a time" (Office Action p. 4). However, this interpretation of "concurrency" does not make sense. The ability to transform one element at a time is <u>not</u> a hallmark of concurrency. According to the present application, one way concurrency can be achieved is by parallel processes (*see* specification para. [0029]) as opposed to a single thread process that starts at the beginning of data to be transformed and continues to the end of the data in a serial manner. Transforms that use single thread processes, such as Lee, are discussed in the Description of the Prior Art section of the specification (para. [0004]).

Applicants have reviewed the paragraphs cited by the Examiner in context with the surrounding text of Lee and found no disclosure, teaching, or suggestion that concurrent or parallel processes are or should be used in Lee's navigation of XML templates, style sheets, or schemas and transformations. Furthermore, Applicants have searched the 97 pages of Lee and found no reference to concurrent or parallel processes used for such navigation and transformations. Thus, Lee fails to "include a transform engine configured to . . . <u>concurrently</u> navigate the selected transform process definition and the data to be transformed" (emphasis

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added) as recited in claim 1. Similarly, Lee fails to teach or suggest "<u>concurrent[ly]</u> navigat[ing]" (emphasis added) as recited in independent claims 7 and 20 or "wherein the means for positioning the definition pointer can be invoked <u>concurrently</u> with the means for positioning the payload pointer" (emphasis added) as recited in independent claims 65.

Applicants therefore request the withdrawal of the rejections of independent claims 1, 7, 20, and 65 and all claims depending thereon for at least the reasons stated above.

Claims 14 and 57. The Office Action asserts that Lee discloses using identification data to select a transform process definition from a set of one or more transform process definitions and cites Lee paragraphs [0304, 0305, and 0312]. However, the cited paragraphs fail to disclose <u>using identification data to select</u> a transform process definition. Instead, as read in context, Lee's Identity Server 40 retrieves an XML template (*i.e.* the code in Lee para. [0309]) for each identified program and peripheral program and identifies a register file (*i.e.* the code in Lee para. [0305]) corresponding to at least one combination of an application and a program (Lee para. [0304]). The program's XML template, XML schema, and XSL stylesheet are retrieved by using the register file (Lee para. [0306]). Accordingly, neither Lee's XML template or register file are selected <u>using the identification data</u>, such as "John Smith" or "j.smith@company.com" in Lee para. [0312]. Furthermore, Lee as a whole does not appear to teach or suggest "<u>using the identification data</u> to select a transform process definition from a set of one or more transform process definitions" (emphasis added) as recited in independent claim 14. Similarly, Lee does not teach or suggest "<u>using the identification information</u> to extract a transform process definition from a plurality of transform process definitions" (emphasis added) as recited in independent claim 57. Therefore, Lee does not anticipate the original claims.

Applicants therefore request the withdrawal of the rejections of independent claims 14 and 57 and all claims depending thereon for at least the reasons stated above.

Claims 32 and 62. Claim 32 has been amended to incorporate the limitation of claim 43, and claim 62 has been amended to recite that "the transform definition also includ[es] a pointer to a function." The Office Action asserts that Lee discloses that a transform definition

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includes a translation codeset parameter and points to Lee paragraphs [0305, 0308, and 0312] for the disclosure. However, the cited paragraphs fail to disclose a transform definition including a translation codeset parameter, such as a pointer to a function or a lookup table (*see* specification para. [0075]). Instead, the cited paragraphs disclose application, program, and button names (*e.g.* <ObButton name="a__button__name"/>), template, stylesheet, and XML schema names (*e.g.* <ObSchema name="Its__XML__schema__name.xsd"/>), and directives (*e.g.* <oblix:data attrname="mail"/>) (Lee para. [0305 and 0308]). Lee para. 312 merely shows an XML template with output data. None of the names or directives is a translation codeset parameter such as a call to a function or lookup table.

A call to a function or lookup table offers flexibility in determining output data. For example, the abbreviation "USA" can be transformed into "United States of America" (*see* specification para. [0075]). In addition, a new 'leaf' element can be created off "United States of America," such as a leaf element representing one of the fifty states (*see Id.*). Moreover, a call to a function can allow much more complex, non-linear, and custom transformations on the input data into output data. For example, a function could determine that employees who are attorneys in California and with last names beginning with H-M and who have not graduated from law school in the last three years are required to attend a minimum continuing learning education seminar. The present claims allow a translation codeset parameter such as a pointer to the function to be embedded in a transform definition. Lee does not provide for such translation codeset parameters in its registration files, XML template, XML schema, or XSL stylesheet.

Because Lee does not disclose or suggest a "transform definition includ[ing] a translation codeset parameter" (amended claim 32) or a "transform definition also including a pointer to a function" (amended claim 62), Lee does not anticipate the claims. Thus, Applicants request the withdrawal of the rejections of independent claims 32 and 62 and all claims depending thereon for at least the reasons stated above.

Claims 44 and 59. Claim 44 has been amended to incorporate the limitation of claim 49, and claim 59 has been amended to recite "computer instructions to invoke parallel processes to position the definition pointer and increment the payload pointer such that positioning the definition pointer and incrementing the payload pointer are enabled to occur

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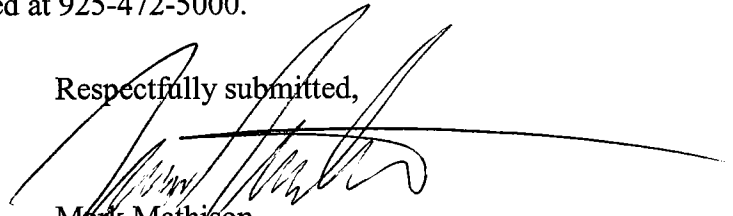Reply to Office Action of Sept. 29, 2008

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concurrently." The Office Action asserts that Lee discloses a parallel process to process sub-definitions of the read transform definition and points to Lee paragraph [0308] to support that assertion (Office Action p. 15). However, Lee paragraph [0308] merely discloses that a registry file can contain additional information related to preparing an output display, such as an "ObButton" directive which apparently displays a button. The cited paragraph does not disclose parallel processes. Furthermore, Lee as a whole does not disclose, teach, or suggest "invoking a parallel process to process sub-definitions of the read transform definition" (emphasis added) as recited by amended claim 44 or "computer instructions to invoke parallel processes to position the definition pointer and increment the payload pointer such that the positioning the definition pointer and incrementing the payload pointer are enabled to occur concurrently" (claim 59; emphasis added). Thus, Lee does not anticipate the claims. Applicants therefore request the withdrawal of the rejections of independent claims 44 and 59 and all claims depending thereon for at least the reasons stated above.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 925-472-5000.

Respectfully submitted,

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